

**New Hampshire Small MS4 General
Permit**

Annual Report

Town of Exeter

Permit Year 1

Reporting Period: May 1, 2018 to June 30, 2019

EPA NPDES Permit Number: NHR041007

Certification

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

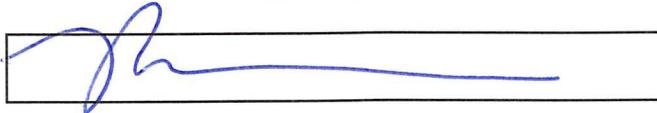
Printed Name

Russell Dean

Title

Town Manager

Signature



Date

9/30/19

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Small MS4 Authorization

The following annual report is intended to document on the activities undertaken over the reporting period from May 1, 2018 – June 30, 2019 in accordance with the Notice of Intent (NOI). The NOI can be found at the following (document name or web address):

<https://www3.epa.gov/region1/npdes/stormwater/nh/tms4noi/exeter.pdf>

Compliance activities have been identified and described in the Town of Exeter's Stormwater Management Program (SWMP) and Illicit Discharge Detection and Elimination (IDDE) Plan. These documents can be found at the following (document name or web address) and will be referred to throughout this report:

SWMP:

https://www.exeternh.gov/sites/default/files/fileattachments/public_works/page/38331/2019.06_exeter_nh_swmp.pdf

IDDE Plan: Located at the Exeter Department of Public Works – 13 Newfields Road

MCM 1 - PUBLIC EDUCATION AND OUTREACH

BMP 1: Pet Waste Brochures/Pamphlets

Document Name and/or Web Address:

"Every Drop" post cards or flyer https://www4.des.state.nh.us/nh-ms4/?page_id=54
See Attachments for BMP 1.

Description:

Distribution and promotion of "Every Drop" post cards or flyer with proper pet waste management, impacts of improper management, pet waste ordinance, and disposal requirements messaging. May include pledge to pick up pet waste to be made available during dog registration and other events or venues (veterinarians, dog training, groomers, etc.). Every Drop is a collaborative education effort with PREP, NHDES, and other partners.

In Permit Year 1, the "Every Drop" flyer was posted at the three trailheads that allow dogs and have pet waste stations. Flyers were made available at the Town Clerk and DPW offices. It was also shared via social media on the Conservation Commission and DPW Facebook pages as well as the Think Blue Exeter website. Four people from Exeter signed the pledge (<https://stateofourestuaries.org/everydrop/petpledge/>). Additionally, to encourage dog owners to timely license their dogs and to keep their dogs' rabies vaccinations current, the Town Clerk's office runs a "Top Dog Contest" (<https://www.exeternh.gov/townclerk/2019-top-dog-contest-entry-form>).

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

Dog owners and/or dog walkers are aware of the potential water quality impacts from pet waste, local pet waste ordinances, and how to dispose of pet waste properly. If pledges are signed, there will be an increase of dog owners committed to picking up pet waste. Assessment of goals will be discussed in greater detail in Permit Year 2. For additional information, refer to: https://www4.des.state.nh.us/nh-ms4/?page_id=54, "Minimum Control Measure 1: Public Outreach and Education".

Message Date:

Annually in spring and throughout the permit year

BMP 2: Clean Water/Healthy Lawns Brochures/Pamphlets

Document Name and/or Web Address:

5 Easy Steps "Healthy Lawns – Clean Water": <https://www.exeternh.gov/bcc/exeters-healthy-lawns-clean-water-initiative>
See Attachment for BMP 2.

Description:

Distribute Clean Water/Healthy Lawns information. In Permit Year 1, Exeter's Healthy Lawns – Clean Water Initiative posted the “5 Steps for a Healthy, Natural Lawn that Keeps our Rivers Clean” flyer on their webpage and Facebook page on April 12, 2019. More healthy lawn, clean water tips are posted on the Think Blue Exeter website. Additionally, the Healthy Lawns Clean Water Facebook page shares information related to stormwater impact, water quality, and environmentally friendly law care techniques. The page has 154 followers with an average reach of about 15-30/post/week. The Planning Department made lawn care magnets available since March of 2019; approximately 60 were picked up. Also in March of 2019, the Town adopted an amendment to the Town's fertilizer regulations to allow restricted application of fertilizer for heavy sports turf fields within the shoreland protection district.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

To see an increased awareness of proper fertilizer use. Assessment of goals will be discussed in greater detail in Permit Year 2.

Message Date:

Annually in the spring

BMP 3: Development Regulations Fact Sheet Brochures/Pamphlets

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 4: Advertise Green SnoPro Certification Website

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 3.

BMP 5: Septic Smart Displays/Posters/Kiosks**Document Name and/or Web Address:**

<https://www.exeternh.gov/bcc/think-blue-septic-system-maintenance>

See Attachment for BMP 3.

Description:

Utilize Septic Smart posters to encourage residents to inspect and maintain their septic systems each year. In Permit Year 1, the Septic Smart posters were displayed at the Town Clerk's office and at the library from September 17 through September 21, 2018. Septic systems maintenance flyers were also provided with the displays. Additionally, the Think Blue Exeter website includes a septic system maintenance page with similar information.

Targeted Audience:

Residents with septic systems

Measurable Goal(s):

To see an increase in septic system testing/maintenance. Assessment of goals will be discussed in Permit Year 2.

Message Date:

Annually in the fall during Septic Smart week.

BMP 6: Leaf and Yard Waste Collection

Document Name and/or Web Address:

See Attachment for BMP 6.

Description:

Post notices of leaf and yard waste collection. In Permit Year 1, notices were posted on the town's website, DPW Facebook page, and in the Exeter News-Letter during October and November of 2018 and April of 2019.

Targeted Audience:

Residents, businesses, institutions, and commercial facilities

Measurable Goal(s):

To see an increase in the disposal of leaf and yard waste at the transfer station. It has been estimated that approximately 200 cubic yards of material was collected during the Fall of 2018 and Spring of 2019 curbside leaf collection. The amount of material brought directly to the transfer station has not been determined; however the Town began grinding and removing the brush pile at the transfer station. Starting next year, the Town will be able to estimate the volume of leaf and yard waste that is brought to the transfer station. Assessment of goals will be discussed in greater detail in Permit Year 2.

Message Date:

Annually in the spring and fall

BMP 7: Exeter Conservation Commission's Guest Speaker Night

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 8: Stormwater Pollution Prevention for Industrial Sites Flyer

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 5.

MCM 2 - PUBLIC PARTICIPATION

BMP 9: Public Review of Stormwater Management Program (SWMP)

The Town of Exeter's Stormwater Management Program (SWMP) is available to the public on the Town's website.

BMP 10: Public Participation in SWMP Development

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 11: Shoreline/Waterbody

The Natural Resource Planner lead a spring cleanup of the Seacoast School of Technology parking lot and Morrissette property with 65 students from the Seacoast School of Technology for Earth Day on April 19, 2019. Three members of the Conservation Commission participated in the cleanup and the DPW disposed of the trash that was collected. Additionally, students from Phillips Exeter Academy helped remove invasive plants from the Henderson Swasey Town Forest as part of Climate Action Day on April 26, 2019. This effort was also led by the Natural Resource Planner. These events were posted on the Conservation Commission's Facebook page (see Attachment for BMP 11).

MCM 3 – ILLICIT DISCHARGE DETECTION AND ELIMINATION

BMP 12: Sanitary Sewer Overflow (SSO) Inventory

There were four SSOs identified in Permit Year 1. All were corrected and reported to EPA and other government agencies, as required. The list of SSOs is available at: <https://www.exeternh.gov/publicworks/combined-sewer-sanitary-sewer-overflows>.

BMP 13: Storm Sewer System Map

Phase 1 mapping of all known stormwater infrastructure has been completed. The map is continually updated as new information is available.

BMP 14: Written IDDE Program Development

A written IDDE plan has been developed. The IDDE plan will be reviewed and finalized in Permit Year 2.

BMP 15: Implement IDDE Program

An initial outfall inventory and priority ranking has been completed and included in the IDDE plan and attached to the annual report (see Attachment for BMP 15). The development of written catchment investigation procedures will progress in accordance with the accepted NOI and is scheduled to be completed in Permit Year 2. During Permit Year 1, no illicit discharges were identified.

BMP 16: Implement Employee Training

No IDDE training was conducted in Permit Year 1. Annual IDDE training will be completed in accordance with the IDDE plan.

BMP 17: Conduct Dry Weather Screening

No dry weather screening was conducted in Permit Year 1. Dry weather screening will progress in accordance with the accepted NOI and is scheduled to begin in Permit Year 2.

BMP 18: Conduct Wet Weather Screening

No wet weather screening was conducted in Permit Year 1. Wet weather screening will progress in accordance with the accepted NOI and is scheduled to begin in Permit Year 2.

BMP 19: Ongoing Screening

Ongoing screening will progress in accordance with the accepted NOI (upon completion of the IDDE program).

BMP 20: IDDE Regulations

The existing Storm Drainage Ordinance prevents illegal discharges to the drainage system, with fines. The ordinance has been reviewed and did not require modification for compliance with the 2017 NH Small MS4 General Permit.

MCM 4 – CONSTRUCTION SITE STORMWATER RUNOFF CONTROL

BMP 21: Sediment and Erosion Control Ordinance

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations as a regulatory mechanism to require the use of sediment and erosion control practices at construction sites. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit.

BMP 22: Site Plan Review Procedures

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations which outline the site plan review procedures. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit. During Permit Year 1, seven Planning Board applications were reviewed.

BMP 23: Procedures for Site Inspection and Enforcement of Erosion and Sediment Control Measures

The Town of Exeter contracts with a local engineering firm to perform site inspections of erosion and sediment control measures during construction. During Permit Year 1, seven sites that were greater than an acre were inspected with a total of 65 inspections completed. The site inspector uses the Town's Site Plan Review and Subdivision Regulations as well as the approval and permit conditions as a general guideline for inspections. No enforcement action was needed; deficiencies noted were brought to the attention of the contractor during the site visit and corrected by the contractor.

BMP 24: Construction and Site Waste Controls

The Town of Exeter incorporated requirements for construction operators to control onsite wastes into the Site Plan Review and Subdivision Regulations, which were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit.

MCM5 – POST-CONSTRUCTION STORMWATER MANAGEMENT IN NEW DEVELOPMENT AND REDEVELOPMENT

BMP 25: Post-Construction Ordinance

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations as a regulatory mechanism to address post-construction stormwater management. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit.

BMP 26: Street Design and Parking Lot Guidance Report

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 27: Green Infrastructure Report

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 28: List of Municipal Retrofit Opportunities

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 4.

BMP 29: As-built Plans for On-site Stormwater Controls

The Town of Exeter will rely on the Site Plan Review and Subdivision Regulations for procedures to require submission of as-built plans from private development projects. The Site Plan Review and Subdivision Regulations were amended in April of 2018 to meet the provisions of the 2017 NH Small MS4 General Permit.

MCM 6 – GOOD HOUSEKEEPING AND POLLUTION PREVENTION FOR PERMITTEE OWNED OPERATIONS

BMP 30: Parks and Open Spaces Operations and Maintenance (O&M) Procedures

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 31: Buildings and Facilities Operations and Maintenance (O&M) Procedures

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 32: Vehicles and Equipment Operations and Maintenance (O&M) Procedures

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 33: Inventory Town-owned Parks and Open Spaces, Buildings and Facilities, and Vehicles and Equipment

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 34: Infrastructure Operations and Maintenance (O&M) Procedures

Deliverables will progress in accordance with the accepted NOI and is scheduled for Permit Year 2.

BMP 35: Catch Basin Cleaning Program

The current schedule for catch basin cleaning is to clean approximately half of the catch basins each year. Data collected from catch basin cleaning efforts over the last two years is being used to identify catch basins that are more than 50% full for increased cleaning. During Permit Year 1, catch basins were cleaned between June 4 and June 29, 2018. The following is a summary of catch basin cleaning completed (see Attachment for BMP 35 for full 2018 Catch Basin Cleanout Summary):

2018 Catch Basin Cleanout Summary	
Total Town Maintained Catch Basins	1,732
Catch Basin Cleaned in 2018	561
Total Sediment Removed (in)	6,249
Total Sediment Removed (ft ³)	5,790
Catch Basins Cleaned in 2018 at Least 50% Full	200
% Catch Basins Cleaned in 2018 at Least 50% Full	36%

BMP 36: Street sweeping program

The Town of Exeter swept streets and municipally-owned parking lots several times per year. Sweeping occurs three to four days per week between April and November. During Permit Year 1, 1,800 lane miles were swept and 1,640 cubic yards of material were removed.

BMP 37: Winter Road Maintenance Program

The Town of Exeter follows the guidance of the Green SnoPro certification for optimizing salt spreading operations. Chloride alternatives were evaluated and it was

determined to not be economically feasible. The Town optimizes the salt spreading equipment to use the least amount of salt possible.

BMP 38: Stormwater Treatment Structures Inspection and Maintenance Procedures

All treatment units are inspected and maintained annually as part of the catch basin cleaning operations. The written inspection and maintenance procedures are being developed as part of Permit Year 2 activities.

BMP 39: Stormwater Pollution Prevention Plan (SWPPP)

The existing SWPPP for the Exeter DPW Complex was updated in March of 2019 to meet the requirements of the 2017 NH Small MS4 General Permit. The SWPPP will be further updated in Permit Year 2 to fully incorporate the recent upgrades to the wastewater treatment facility into the DPW Complex SWPPP. SWPPPs for other town-owned facilities within the MS4 will be updated as required for Permit Year 2 activities.

TMDLS AND WATER QUALITY LIMITED WATERS

Bacteria/Pathogens

Outfalls to these receiving waters will be ranked as high priority for the IDDE implementation when the initial outfall inventory and priority ranking is updated (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Bacteria/Pathogens, refer to BMPs 1 and 5.

Nitrogen

Outfalls to these receiving waters will be ranked as high priority for the IDDE implementation when the initial outfall inventory and priority ranking is updated (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Nitrogen, refer to BMPs 1, 2, 6, and 36.

The Town of Exeter through its participation in the Seacoast Stormwater Coalition and continued involvement with the NHDES led Pollutant Tracking and Accounting Pilot Project (PTAPP) will satisfy the tracking and accounting requirement of the municipally owned structural BMPs listed in Attachment 1 to Appendix H. The PTAPP 2018 report is attached to the annual report (see Attachment for TMDL and Water Quality Limited Waters – Nitrogen).

Solids, Oil and Grease (Hydrocarbons), or Metals

Outfalls to these receiving waters will be ranked as high priority for the IDDE implementation when the initial outfall inventory and priority ranking is updated (relevant BMP: 15). For the status of other relevant BMPs in the SWMP that address enhanced BMPs for Solids, Oil and Grease (Hydrocarbons), or Metals, refer to BMPs 35 and 36.

DESCRIPTION OF ANY CHANGES IN IDENTIFIED BMPS OR MEASURABLE GOALS

The Town of Exeter has implemented activities in accordance with the approved NOI. All BMPs and measurable goals as outlined in the approved NOI are appropriate. It should be noted that the description of BMP 1 was expanded with more detail as included in the annual report.

ACTIVITIES FOR THE NEXT REPORTING PERIOD

The Town of Exeter will continue to implement activities in accordance with the approved NOI and as noted in the Annual Report.